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31 *Attorneys for Defendant Northwell Health, Inc.*

32 **UNITED STATES DISTRICT COURT**
33 **DISTRICT OF NEVADA**

34 RONNIE GILL, Individually and on behalf of all
35 other similarly situated,

36 Plaintiff,

37 v.

38 PERRY JOHNSON & ASSOCIATES, INC.,

39 AND

40 NORTHWELL HEALTH, INC.,

41 Defendants.

42 Case No. 2:23-cv-01851-CDS-EJY

43 **STIPULATION TO EXTEND TIME TO**
44 **RESPOND TO COMPLAINT**

45 **(FIRST REQUEST)**

1 Plaintiff Ronnie Gill, individually and on behalf of all others similarly situated, (“Plaintiff”)
2 and Defendant Northwell Health, Inc. (“Northwell”) stipulate and respectfully request under Local
3 Rule IA 6 that this Court extend the time for Northwell to respond to Plaintiff’s complaint in the
4 above-captioned action (the “Complaint”) until **January 29, 2024**.

5 Plaintiff filed the Complaint on November 10, 2023 and served on Northwell on November
6 17, 2023. Northwell’s response is currently due by December 8, 2023.

7 Northwell requires this extension to evaluate the complex allegations and causes of action
8 raised in the Complaint, evaluate the merits of each claim, understand the complexities of
9 discovery, speak with plaintiff and co-defendant counsel in each case, and consider options for
10 consolidation or transfer in order to preserve judicial economy. Northwell also requests this
11 additional time to evaluate the numerous putative class action complaints that have been filed
12 against Northwell in Federal and State courts—including nine actions in this District alone—
13 concerning the facts and circumstances that gave rise to the Complaint. A list of these related cases
14 is included as Appendix A.¹

15 This is the first request for extension of time for this deadline. The parties respectfully
16 submit that there is good cause for this extension and the requested extension is not for the purpose
17 of delay.

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23 ¹ Northwell also notes that several additional putative class action complaints have been filed against co-defendant
24 Perry Johnson & Associates, Inc. (“PJ&A”) in Federal and State courts. *See Carter v. Cook County Health and Perry*
25 Johnson & Associates, Inc., No. 2:23-cv-1866 (D. Nev. filed Nov. 13, 2023); *Kurtev et al. v. Cook County Health &*
Hospitals System and Perry Johnson & Associates, Inc., No. 2:23-cv-1905 (D. Nev. filed Nov. 17, 2023); *Belov et al.*
26 v. Perry Johnson & Associates, Inc., No. 2:23-cv-1925 (D. Nev. filed Nov. 20, 2023); *Colon et al. v. Perry Johnson &*
Associates, Inc., No. 2:23-cv-1910 (D. Nev. filed Nov. 20, 2023); *Davis v. Perry Johnson & Associates, Inc.*, No. 2:23-
cv-1932 (D. Nev. filed Nov. 21, 2023); *O’Neill et al. v. Perry Johnson & Associates, Inc. and County of Cook, Illinois*,
No. 2:23-cv-1964 (D. Nev. filed Nov. 28, 2023); *Sept et al. v. Perry Johnson & Associates, Inc.*, No. 2:23-cv-01983
(D. Nev. filed Nov. 30, 2023); *Kimber v. Cook County Health & Hospital System and Perry Johnson & Associates,*
27 Inc., No. 2023CH09293 (Ill. Cir. Ct., Cook County filed Nov. 7, 2023); and *Martin v. Cook County Health & Hospital*
28 System and Perry Johnson & Associates, Inc., No. 2023CH09558 (Ill. Cir. Ct., Cook County filed Nov. 21, 2023).
Northwell has not been named as a defendant in any of these complaints.

1 IT IS SO STIPULATED.

2 Dated: December 5, 2023.

3 SNELL & WILMER

4 By: */s/ Aleem A. Dhalla*

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28 Dated: December 5, 2023.

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29 *Counsel for Plaintiff and Putative Class*

30 **ORDER**

31 Good cause appearing, IT IS HEREBY ORDERED that the Parties' stipulation is
32 GRANTED. Northwell Health, Inc. shall have up to and including **January 29, 2024** to respond
33 to Plaintiff's complaint.

34 **IT IS SO ORDERED.**


35 U.S. MAGISTRATE JUDGE

36 Dated: December 5, 2023